



# IAPP Canada Symposium 2026

Privacy | AI governance | Cybersecurity law

Conference 4-5 May

Workshops 6 May

Training 6-7 May

**TORONTO**

**#IAPPSymposium26**



# Collective Privacy and AI Governance for Small Healthcare Providers

#IAPPSymposium26



# WELCOME AND INTRODUCTIONS



**Angelique Hamilton, CIPP/C**

AMH Consulting



**Simeon Kanev, CIPP/C**

Privacy Officer & Business Lead,

Alliance for Healthier  
Communities



**Alliance for  
Healthier Communities**  
Alliance pour des  
communautés en santé



**Tyler Kempt**

IT & Cybersecurity Lead

Community Health Centres of  
Northumberland



**#IAPPSymposium26**

# Land Acknowledgement



#IAPPSymposium26

# Today's Discussion

- Privacy and AI governance challenges for smaller healthcare organizations
- Why traditional one-off privacy support doesn't scale
- What a collective privacy model looks like in practice
- Case study: Collective PIAs for AI scribes
- Case study: Shared Fractional Privacy Officer
- Questions and discussion

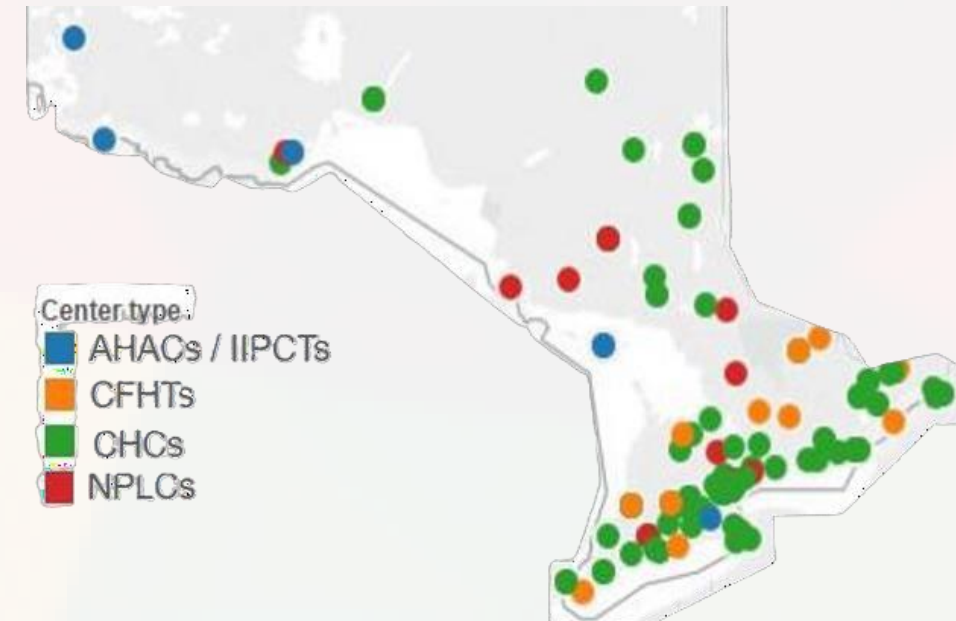
# Alliance for Healthier Communities



Alliance for  
Healthier Communities

Alliance pour des  
communautés en santé

- 100+ member organizations across Ontario:
  - Community Health Centres (CHCs)
  - Nurse Practitioner-Led Clinics (NPLCs)
  - Indigenous Primary Health Care Organizations and teams
  - Community Family Health Teams
  - Other community-governed models
- All members are community-governed, not-for-profit (or Indigenous-governed), and deliver comprehensive healthcare grounded in health equity



#IAPPSymposium26

# Why Our Work Matters

Equitable health and wellbeing for everyone living in Ontario

- Alliance members:
  - Serve **diverse, underserved, and equity-deserving populations** across urban, rural, remote, and Indigenous communities
  - Integrate clinical care, health promotion, system navigation, and community development
  - Are deeply rooted in local communities, with boards drawn from the populations they serve
- Collectively, **we provide care to millions of Ontarians** facing social, economic, and systemic barriers to health



#IAPPSymposium26



# Alliance's Shared Privacy Offerings



## **Communities of Practice**

(Privacy, Security, AI, Risk Management)



## **Member Discussion Boards**



## **Shared Resources Portal**



## **Newsletters and Guides**



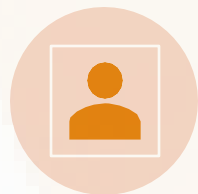
## **Educational Initiatives & Webinars**



## **Annual Professional Learning Event (PLE)**



## **Training for Privacy Officers**



## **General Privacy Support**

#IAPPSymposium26

# The Privacy Dilemma for Small HICs

Meeting Health privacy obligations without resources

- **The current community/primary care health privacy landscape:**
  - Privacy leadership lives off the side of someone's desk
  - PIAs are check-the-box, delayed, or skipped
  - Adoption of new technology outpacing privacy due diligence
  - Risk is implicitly outsourced to vendors
  - Accountability is aspirational, not foundational
- Small-scale healthcare organizations with large-scale privacy governance expectations
- **The problem isn't lack of commitment—it's lack of scale**



#IAPPSymposium26

# Solving Privacy Governance in a Vacuum

## Why “Going it Alone” Doesn’t Work

- Privacy consultants often fill the gap—but when engaged project-by-project, organization-by-organization:
  - Expertise walks out the door
  - Siloed project PIAs are not reusable
  - Same risks assessed again and again
  - Spending repeats without compounding value
  - Vendor due diligence varies by project
  - Every new project feels like starting from zero
- **Collectives build shared capacity**



An aerial photograph of a rowing team in a long, narrow boat on a body of blue water. The boat is white with a dark interior. Four rowers are visible, each with a pink top. They are all using yellow oars. The boat is moving towards the right, leaving a white wake behind it. The water is a deep blue color.

# Collective Privacy in Action

Exploring the Elements of the Privacy Collective



#IAPPSymposium26

# The Collective Model: Stronger Together

Once, Collectively; Many Times, Locally

- **Coordinated, not controlled:** federated governance, local autonomy
- Collective governance centralizes **expertise** — not accountability
- When small healthcare organizations stop working in a vacuum:
  - One assessment creates shared knowledge
  - Shared knowledge makes expertise sustainable
  - Sustainable expertise means decisions compound rather than repeat
  - Compounding decisions give unified voice with regulators and vendors



#IAPPSymposium26

# Collective Vendor Leverage

## Joint Procurement with Privacy Baked-In

- Shared RFP requirements for:
  - AI transparency
  - Data minimization
  - Limits on retention and secondary use
- Standard contractual clauses for similar procurements
- Vendors must meet sector-wide privacy baselines
- Shared vendor assessments
- **Privacy by design** goes from aspirational to procurement requirement



# Privacy & Security By Design

“Privacy & Security” is Really Trust & Safety



PRIVACY



**Privacy** asks:

- Who can access data?
- For what purpose?
- With whose consent?



SECURITY

**Security** asks:

- How is data protected?
- Who controls access?
- How are incidents detected and managed?

Privacy **sets the rules**. Security **enforces the rules**.

You need both — designed together.

#IAPPSymposium26

# Case Studies



#IAPPSymposium26



# Inspiration: Collective Innovation



- Most successful programs begin at the grassroots level, starting from the ground up, rather than top down
- No single person can raise the barn alone
  - Everyone contributes what they have
  - Work is divided according to skill and capacity
  - The barn gets built faster and stronger than any individual effort could achieve
- The result belongs to the whole community

# Collective Privacy Impact Assessments (PIA)

## How Small Healthcare Orgs Avoid Writing the Same PIA x5

- **Problem**

- Each organization repeats the same assessment work
- Especially for common technologies (e.g., AI scribes)
- PIA training keeps things too theoretical

- **Collective Solution**

- One **baseline PIA** for common technology
- Collective participants complete shorter, focused **local deltas**
- Members build PIA muscle by doing



# Collective PIAs for AI Technologies

- **Applicable to:**
  - AI clinical scribes
  - Virtual care platforms
  - AI-enhanced Decision Support tools
  - Automated triage or documentation tools
- **Benefits:**
  - Faster adoption
  - Stronger risk identification
  - Consistent safeguards across the sector

# Before & After the Collective Capacity Shift

## Before

- PIAs inconsistent or late
- Vendor/AI diligence varies by project
- Governance is reactive
- Knowledge is scattered
- Repetitive spending

## After

- **Foundational assessments + local delta review**
- **Shared risk positions and issue logs**
- **Clear governance and escalation**
- **Searchable knowledge base**
- **Money spent compounds into reusable capability**

# Virtual Privacy Office (VPO)

- One-year bespoke consultation and advisory engagement with dedicated privacy experts:



# In Closing

- Collective privacy governance is not a shortcut
- Community health relies on the trust that comes from consistent community privacy
- Collective models do not dilute regulatory intent — they transform it
- If we want robust privacy protection in complex systems, the answer is not asking smaller actors to become larger ones — it is rethinking how accountability is built together.



#IAPPSymposium26

# Thank you | Merci | Migwetch

Tyler Kempt

[tkempt@chcnorthumberland.ca](mailto:tkempt@chcnorthumberland.ca)

Simeon I. Kanev

[simeon.kanev@allianceon.org](mailto:simeon.kanev@allianceon.org)

Angelique Hamilton

[amh@amhconsulting.ca](mailto:amh@amhconsulting.ca)



**#IAPPSymposium26**

# How Did Things Go? (We Really Want To Know)

Did you enjoy this session? Is there any way we could make it better? Let us know by filling out a speaker evaluation.

1. Open the IAPP Events app.
2. Select **IAPP Symposium 2026**.
3. Tap "Schedule" on the bottom navigation bar.
4. Find this session. Click "Rate this Session" within the description.
5. Once you've answered all three questions, tap "Done".

Thank you!

**#IAPPSymposium26**